

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

)

STATE OF TEXAS,)
STATE OF MISSOURI,)
)
Plaintiffs,)
)
v.) Civil Action No. 2:21-cv-00067-Z
)
JOSEPH R. BIDEN, JR.,)
in his official capacity as)
President of the United States, *et al.*,)
)
Defendants.)
)

CORRECTED JOINT MOTION TO ENLARGE PAGE LIMITS

So that they can adequately present their positions to the Court, including addressing the nearly 3,700 page record Defendants produced, as well as other issues presented by the pending motion to postpone, the parties have agreed that to a 45-page limit for Defendant's opposition brief and a 25-page limit on Plaintiffs' reply brief. The parties therefore respectfully request leave of the Court for Defendants to file a brief in excess of the page limit, not to exceed 45 pages, otherwise consistent with the local rules, and for Plaintiffs to file an opposition brief not exceeding 25 pages subject to the same conditions.

//

//

Dated September 1, 2022.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

JUDD E. STONE II
Solicitor General
Texas Bar No. 24076720

PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Texas Bar No. 00798537

WILLIAM T. THOMPSON
Deputy Chief, Special Litigation Unit
Attorney-in-Charge
Texas Bar No. 24088531

/s/ Ryan D. Walters
RYAN D. WALTERS
Special Counsel
Texas Bar No. 24105085

OFFICE OF THE ATTORNEY GENERAL
SPECIAL LITIGATION UNIT
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
Fax: (512) 457-4410
patrick.sweeten@oag.texas.gov
will.thompson@oag.texas.gov
ryan.walters@oag.texas.gov

Counsel for Plaintiff State of Texas

ERIC S. SCHMITT
Attorney General of Missouri

/s/ D. JOHN SAUER
D. JOHN SAUER, #58720MO*
Solicitor General

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

WILLIAM C. PEACHEY
Director

/s/ Erez Reuveni
EREZ REUVENI
Assistant Director
U.S. Department of Justice, Civil Division
Office of Immigration Litigation,
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Tel: (202) 307-4293
Email: erez.r.reuveni@usdoj.gov

BRIAN C. WARD
Senior Litigation Counsel

JOSEPH A. DARROW
Trial Attorney

Counsel for Defendants

MICHAEL E. TALENT, #73339MO *
Deputy Solicitor General

OFFICE OF THE ATTORNEY GENERAL
Supreme Court Building
P.O. Box 899
Jefferson City, Missouri 65102
Tel. (573) 751-8870
Fax (573) 751-0774
John.Sauer@ago.mo.gov

Counsel for Plaintiff State of Missouri

*Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2022, I electronically filed this motion with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Erez Reuveni

EREZ REUVENI